

## **Modern Slavery and Human Trafficking Statement**

Tithegrove Limited recognises that all businesses have an obligation to prevent slavery and human trafficking and is committed to preventing slavery and human trafficking within its business and within the supply chains through which it operates. This statement relates to actions and activities during the financial year 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.

### **Structure and Supply Chains**

Tithegrove Limited is a privately owned civil engineering and groundworks company with offices in Swindon and Taunton. Operating on building sites throughout the Southwest of England and the Home Counties, our primary business involves teams of site staff working as the main sub-contractor on client sites, supported by office-based staff. Our largest market is house building.

Most of our workforce is directly employed, and we do not operate outside the UK. Our supply chains fall into 2 main categories 1) Plant 2) Materials and 3) Specialist Labour that are supplied by a combination of large national companies and smaller independents.

### **Policies on Modern Slavery**

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Tithegrove Limited operates to ensure fairness in the recruitment, retention, and development of all employees. It seeks to comply with all applicable employment legislation and provides a work environment where employees are treated with respect, dignity, and consideration.

Tithegrove Limited monitors its supply chains and its suppliers to ensure, so far as is possible and practicable, that slavery and human trafficking is not taking place within them.

Tithegrove Limited operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

#### Whistleblowing policy

Tithegrove operates a whistleblowing policy, which provides employees with a way to raise concerns including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure provides a way for workers to make protected disclosures.

#### Recruitment policy

Tithegrove Ltd operate a robust recruitment policy, including right to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Tithegrove Limited requires recruitment agencies to sign up to our terms of business to source labour on our behalf, these terms of business include their compliance to modern slavery and human trafficking legislation

### **Due Diligence Processes**

As part of our commitment to identify and eradicate slavery and human trafficking from within our business and supply chains, we work closely with our suppliers to ensure compliance with legislative obligations. We expect those organisation's to have suitable anti-slavery and human trafficking policies and processes.

We seek to build long-standing relationships with suppliers and make our expectations of ethical business behavior clear to them. Systems are in place to encourage the reporting of concerns.

Tithegrove Limited has a zero-tolerance view to slavery and human trafficking and we expect that view to prevail in our supply chain and contractors. Senior Managers within Tithegrove Limited are responsible for compliance in their respective departments, insofar as there is perceived to be a risk of encouraging, engaging, or sustaining slavery and human trafficking.

### **Our Effectiveness in Combating Slavery and Human Trafficking**

Most of our staff are employed directly, and therefore via a direct recruitment process, with subsequent monitoring of performance and the attainment of regulatory standards. As a result, our exposure within our human resources to human trafficking and slavery is low.

Labour only sub-contractors and consultants signing up to our terms of business including compliance with the Modern Slavery Act 2015 are made aware of the standards and expectations Tithegrove requires when providing services on our behalf.

### **Training for staff**

To ensure appropriate levels of risk awareness in respect of modern slavery and human trafficking, we provide training to key staff, in particular, Directors, Heads of Departments, members of Buying, People, Production Departments, SHEQ and Commercial Departments. All Directors in the business have been briefed on the subject. All new site employees are made aware of the company's stance on modern slavery and what procedures they should follow if they have concerns.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and was approved on 24<sup>th</sup> July 2024 by Tithegrove's board of directors, who review and update it annually.



**Dino Torchia**  
**Managing Director**